

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

CHAPTER 7
CASE NO. 18-14276 - MSH

In Re:)	
)	
Joan M. Figuereo-Castillo, and)	CERTIFICATION OF CONFERENCE AND WRITTEN REPORT OUTLINING PROPOSED DISCOVERY PLAN
Yuridania D. Suero,)	
Debtors)	
)	
Shamrock Finance LLC,)	
Plaintiff)	
)	Adversary Proceeding
v.)	
)	No. 19-01014
Joan M. Figuereo-Castillo,)	
Defendant)	
)	

Pursuant to Fed. R. Civ. P. Rule 26(f), as made applicable herein by Rule 7026 of the Federal Rules of Bankruptcy Procedure, Plaintiff Shamrock Finance LLC (“Plaintiff”) and Defendant Joan M. Figuereo-Castillo (“Defendant”) hereby file this certification and written report outlining a proposed discovery plan. This discovery plan does not constitute a change from that plan set forth by the Court’s Pretrial Order dated March 19, 2019.

A. CERTIFICATION

The undersigned hereby certify that on April 3, 2019 they conferred by telephone pursuant to Fed. R. Civ. P. Rule 26(f), as made applicable by Rule 7026 of the Federal Rules of Bankruptcy Procedure, to consider the nature and basis of their claims, defenses and the possibility for the prompt settlement or resolution of the above-captioned adversary proceeding, and to develop a proposed discovery plan.

B. PROPOSED DISCOVERY PLAN

The parties propose the following discovery plan:

- a. Automatic required disclosure pursuant to Fed. R. Civ. P. Rule 26(a)(1) and (2), as made applicable by Rule 7026 of the Federal Rules of Bankruptcy Procedure, will be made on or before April 17, 2019;
- b. All discovery shall be completed on or before June 12, 2019, unless the Court upon appropriate motion alters the time and manner of discovery;
- c. The parties shall complete and file a Joint Pretrial Memorandum on or before August 12, 2019.

The parties currently do not believe that any changes are necessary to the manner of and limitations on discovery provided by the rules of this Court.

C. AUTOMATIC DISCLOSURES

The parties state that they will comply with the automatic disclosure provision of Rule 26(a)(1) and (2) on or before April 17, 2019 as required by Rule 26(c)

D. ESTIMATED LENGTH OF TRIAL

The parties estimate that trial will take no more than one (1) day.

[Remainder of Page Left Blank Intentionally, Signature Page to Follow]

Respectfully submitted,
SHAMROCK FINANCE LLC
By its attorney,

/s/ James J. McNulty
James J. McNulty, Esq. BBO # 339940
40 Court Street, 11th Floor
Boston, MA 02108-2202
Tel. No. (617) 263-3300
jjm@jjmcnultylaw.com

Dated: April 16, 2019

Respectfully submitted,
JOAN M. FIGUERO-CASTILLO
By his attorney,

/s/ Theodore W. Beauparlant*
Theodore W. Beauparlant, Esq.
25 Washington Square
Haverhill, MA 01830
Tel. No. (978) 521-4477
beauparlantlaw@aol.com
BBO No. 553763

Dated: April 16, 2019

* Signed with permission pursuant to MLBR Appendix 8, Rule 8.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

CHAPTER 7
CASE NO. 18-14276 - MSH

In Re:

Joan M. Figuereo-Castillo, and
Yuridania D. Suero,
Debtors

Shamrock Finance LLC,
Plaintiff

v.

Joan M. Figuereo-Castillo,
Defendant

CERTIFICATE OF SERVICE

Adversary Proceeding

No. 19-01014

I, James J. McNulty, Esq., counsel for **SHAMROCK FINANCE LLC** hereby certify that on this 16th day of April, 2019 I served the foregoing *Certification of Conference and Written Report Outlining Proposed Discovery Plan* and *Certificate of Service* by causing same to be filed with the Bankruptcy Court and through ECF system via e-mail at the address below:

Counsel for Defendant
Theodore W. Beauparlant, Esq.
25 Washington Square
Haverhill, MA 01830
Tel. No. (978) 521-4477
beauparlantlaw@aol.com

/s/James J. McNulty
James J. McNulty, Esq. BBO# 339940
40 Court Street, Suite 1150
Boston, MA 02108
Tel. 617-263-3300
jjm@jjmcnultylaw.com

Certification and Discovery Plan

